

2. PROJECT MANAGEMENT RESPONSIBILITIES

The organizational structure for the OU 7-13/14 integrated probing project is divided into two functional areas, task site and ER managerial responsibilities. These areas are described in this section.

2.1 Task Site Responsibilities

The organizational structure for the OU 7-13/14 integrated probing project reflects the resources and expertise required to perform the work while minimizing risks to worker health and safety and the environment. Figure 2-1 shows task site positions and lines of responsibility and communication. The subsequent sections outline the responsibilities of these task site personnel. Table 11-4 lists the names of key individuals for emergency contact purposes.

2.1.1 Field Team Leader

The FTL represents the ER organization at the task site with ultimate responsibility for the safe and successful completion of the project. The FTL works with other field team members to execute the work plan activities (i.e., probehole plan and field sampling plan). The FTL enforces task-site control, documents attendance and activities, and may conduct or delegate the responsibility to conduct POD briefings at the start of the shift. Specific task site duties identified for the FTL, HSO, and other individuals, are explicitly identified in the appropriate PLN and TPRs. Additionally, the FTL may conduct or delegate the performance of scheduled or targeted self-assessments in accordance with MCP-8, "Self-Assessment Process for Continuous Improvement." Health and safety issues will be brought to the attention of the FTL.

When the nature of the field work requires involvement or field team staffing by RWMC equipment operators, laborers, or other crafts, a representative from the organization supplying these additional resources will interface with the FTL to provide work supervision. If the FTL leaves the task site, an alternate individual will be appointed to act as the FTL. Persons acting as FTL on the task site must meet all the FTL training requirements outlined in Section 4 of this HASP. The identity of the acting FTL shall be conveyed to task-site personnel and communicated to the RWMC shift supervisor (SS) as appropriate. The FTL will provide technical support to the RWMC command post during emergency events for the OU 7-13/14 project.

2.1.2 Health and Safety Officer

The health and safety officer (HSO) is the person assigned to the task site to serve as the primary contact for health and safety issues. The HSO advises the FTL on all aspects of health and safety, and is authorized to stop work at the task site if any operation threatens worker or public health and/or safety. The HSO may be assigned other responsibilities, as stated in other sections of this HASP, as long as they do not interfere with the primary responsibilities. The HSO is authorized to verify compliance to this HASP, conduct inspections in accordance with MCP-3449, "Safety and Health Inspections," institute decontamination procedures, and require corrections, as appropriate. The HSO is supported by environmental, safety, health and quality assurance (ESH&QA) professionals at the task site (i.e., SP, IH, RCT, radiological engineer [RE], environmental compliance and facility representatives), as necessary.

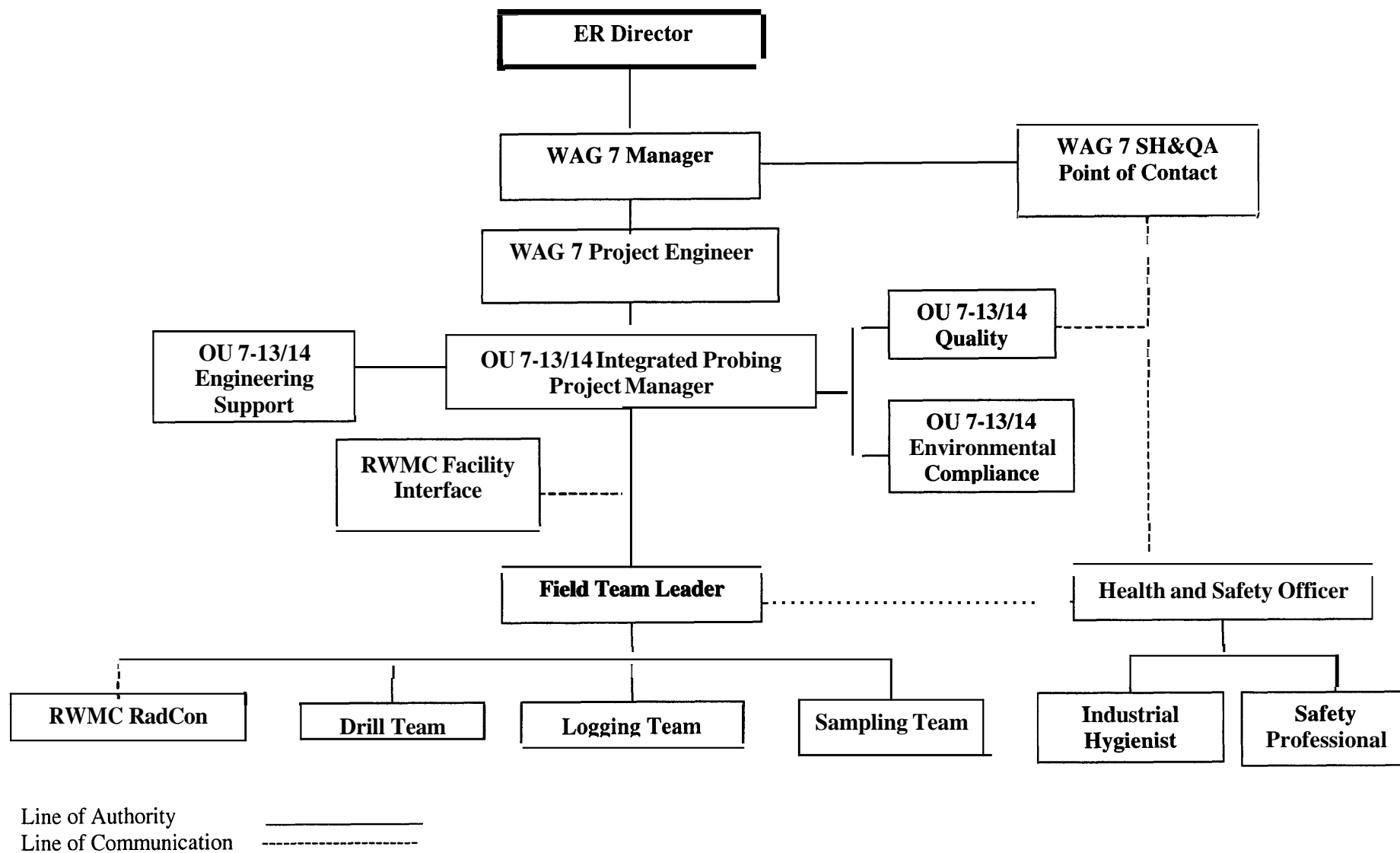


Figure 2-1. Organization chart for Operable Unit 7-13/14 project.

Persons assigned as the HSO, or alternate HSO, must be qualified (per the OSHA definition) to recognize and evaluate hazards, and will be given the authority to take or direct actions to ensure that workers are protected. While the HSO may also be the IH, SP, or in some cases the FTL (depending on the hazards, complexity, and size of the activity involved, and required concurrence from the **WAG 7** ESH&QA point of contact), at the task site, other task-site responsibilities of the HSO must not conflict with the role of the HSO at the task site.

If it is necessary for the HSO to leave the site, an alternate individual will be appointed by the HSO to fulfill this role and the identity of the acting HSO will be communicated to task-site personnel.

2.1.3 Project Environmental Compliance

The assigned OU **7-13/14** project environmental compliance person oversees, monitors, and advises the PM and FTL performing task-site activities on environmental issues and concerns by ensuring compliance with DOE Orders, EPA regulations, and other regulations concerning the effects of task-site activities on the environment. The environmental compliance person provides support surveillance services for hazardous waste storage and transport and surface/storm-water runoff control.

2.1.4 Quality Engineer

An INEEL quality engineer provides guidance on task-site quality issues, when requested. The quality engineer may observe task-site activities to verify that task-site operations comply with quality requirements. **As** applicable, the quality engineer identifies activities that do not comply, or have the potential for not complying, with quality requirements and suggests corrective actions. The quality engineer will prepare inspection criteria for materials procured to support the project.

2.1.5 Radiological Engineer

The RE is the primary source for information and guidance relative to evaluation and control of radioactive hazards at the task site. The RE will provide engineering design criteria and review of confinement structures (sampling only) and make recommendations to minimize health and safety risks to task-site personnel. The RE is responsible to (1) perform radiation exposure estimates and as low as reasonably achievable (**ALARA**) evaluations, (2) identify the type(s) of radiological monitoring equipment necessary for the work, (3) advise the HSO and RCT of changes in monitoring or personal protective equipment (PPE), and (4) advise personnel on task-site evacuation and reentry. The RE may also have other duties to perform as specified in other sections of this HASP, or in Manual 15A, *Radiation Protection-INEEL Radiological Control Manual* (INEEL 2001).

2.1.6 Radiological Control Technicians

The assigned INEEL RCTs are the primary source for information and guidance on radiological hazards and will be present at OU **7-13/14** integrated probing task sites during all operations. The RCT is responsible to (1) perform radiological surveying of the task site, equipment, and samples, (2) provide guidance for radioactive decontamination of equipment and personnel, and (3) accompany the affected personnel to the nearest INEEL medical facility for evaluation if significant radiological contamination occurs. The RCTs must notify the FTL and HSO of any radiological occurrence that must be reported, as directed by the Manual 15A, *Radiation Protection-INEEL Radiological Control Manual*. The RCTs may have other duties at the task site as specified in other sections of this HASP, or in INEEL program requirements documents (PRDs) or MCPs. Radiological control technicians will also make required notification to the RWMC RadCon supervisor if continuous air monitors (CAMs) or other instrumentation exceed alarm set points or radiological work permit (RWP) limits.

2.1.7 Industrial Hygienist

The assigned INEEL **M** is the primary source for information regarding nonradiological, hazardous, and toxic agents at the task site. The IH assesses the potential for worker exposures to hazardous agents according to INEEL MCPs and accepted industry IH practices and protocol. By participating in task-site characterization, the IH (1) assesses and recommends appropriate hazard controls for the protection of task-site personnel, (2) operates and maintains airborne sampling and monitoring equipment, and (3) reviews for effectiveness, and recommends and assesses the use of PPE required in this HASP (recommending changes as appropriate).

Following an evacuation, the IH, in conjunction with other recovery team members, will assist the FTL to determine whether conditions exist for safe task-site reentry, as described in Subsection 11.7 of this HASP. Personnel showing health effects (signs and symptoms) resulting from possible exposure to hazardous agents will be referred to an Occupational Medical Program (OMP) physician by the **M**, their supervisor, or the HSO. The IH may have other duties at the task site, as specified in other sections of this HASP, or in INEEL PRDs or MCPs. During emergencies involving hazardous materials, airborne sampling and monitoring results will be coordinated with members of the Emergency Response Organization (ERO). In some cases, an IH technician may fill **M** position.

2.1.8 Fire Protection Engineer

The assigned INEEL fire protection engineer (FPE) reviews the work packages and fire hazard analysis, conducts pre-operational and operational fire hazard assessments, and is responsible for providing technical guidance to OU 7-13/14 personnel regarding all fire protection issues. Additionally, the assigned FPE may provide fire protection support for the development and review of project fire protection documentation (e.g., pre-fire plan and fire hazards analysis).

2.1.9 Safety Professional

The assigned INEEL safety professional reviews work packages, observes site activity, assesses compliance with the *INEEL Safety and Health Manual*, Manual 14A, signs safe work permits (SWPs), advises the FTL and HSO on required safety equipment, answers questions on safety issues and concerns, and recommends solutions to safety issues and concerns that arise at the task site. The SP may conduct periodic inspections, in accordance with MCP-3449, "Safety and Health Inspections," and may have other duties at the task site as specified in other sections of this HASP, or in INEEL PRDs or MCPs.

2.1.10 Logging Team

Downhole logging tasks will be conducted by logging team personnel and specialized equipment to conduct geophysical logging. The subcontractor representative or supervisor will report to the FTL for technical issues and other logistics and administrative matters. Subcontractor representatives, along with the FTL and other field team members, work as a team to accomplish day-to-day logging and assay operations at the task site, identify and obtain additional resources needed at the site, and interact with the HSO, **M**, SP, RE, and RCTs on matters regarding health and safety. The subcontractor representative or supervisor will provide information to the FTL and HSO regarding the nature of their intended tasks, hazards, and mitigation work for the daily POD meeting.

2.1.11 Sampling Team

The field sampling team is responsible to collect and prepare all Type-B probe samples. They will collect, preserve, ship, and store all samples in accordance with the "Field Sampling Plan for Monitoring

of Type-B Probes in Support of the Integrated Probing Project Operable Unit 7-13/14 (Draft)” (Salomon 2001). Sampling team members will coordinate all activities with the FTL.

2.1.12 Field Team Members

All field, INEEL, and subcontractor team members (drillers, helpers, equipment operators, and other personnel called out by position in this section) shall understand and comply with the requirements of this HASP. The FTL or HSO will brief the field team members at the start of each shift. During the POD, all daily tasks, associated hazards and mitigation, engineering and administrative controls, required PPE, work control documents, and emergency conditions and actions will be discussed. Input from the project SP, IH, and RadCon personnel to clarify task health and safety requirements will be provided. All personnel are encouraged to ask questions regarding site tasks and provide suggestions on ways to perform required tasks in a more safe and effective manner based on the lessons learned from previous day’s activities.

Once at the OU 7-13/14 task site, personnel are responsible to identify any potentially unsafe situations or conditions to the FTL or HSO for corrective action.

Note: If it is perceived that an unsafe condition poses imminent danger, any field team member or other project personnel is authorized to stop work immediately, then notify the FTL or HSO of the unsafe condition.

2.1.13 Non-Field Team Personnel

All persons who may be on the OU 7-13/14 project sites to complete limited tasks (e.g., maintenance, refueling, vendor services), inspections, or assessments, or do not perform required tasks at the project sites, are considered non-field team personnel for the purposes of this project. A person shall be considered “onsite” when they are present in or beyond the designated SZ. Non-field team personnel or “occasional site workers” under 29 CFR 1910.120/1926.65, must meet minimum training requirements for the area they have a demonstrated need to access at the OU 7-13/14 project site, as identified in Section 4 of this **HASP**. Non-field workers who have a demonstrated need to routinely access the project site will be trained to a HAZWOPER 40-hour level and complete three days of supervised field experience, in accordance with 29 CFR 1910.120(e), in order to become a field team member.

2.1.14 Visitors

All visitors with official business at OU 7-13/14 project sites (including INEEL personnel, DOE representatives, and/or state or federal regulatory agencies) may not proceed beyond the SZ without meeting the following requirements:

- Receive OU 7-13/14 site-specific HASP training and sign the associated training roster
- Provide proof of meeting all training requirements specified in Section 4 of this HASP for the area to be accessed

- Sign applicable radiological work permits, safe work permits, and job safety analysis for the area(s) to be accessed
- Wear appropriate PPE.

Note: Visitors may not be allowed beyond the SZ during certain OU 7-13/14 project site tasks (e.g., probe installation, drill-rig movement, sampling, others, as determined by the HSO) to minimize safety or health hazards or as an ALARA consideration. The determination as to any visitor's "need" for access beyond the SZ at the OU 7-13/14 project site will be made by the FTL and HSO in consultation with RWMC RadCon personnel.

A fully trained task-site representative (such as the FTL, HSO, or a designated alternate) will escort visitors when entering the OU 7-13/14 project site beyond the SZ.

A casual visitor to the OU 7-13/14 task site is a person who does not have a specific task to perform or other official business to conduct at the task site.

Note: Casual visitors are not permitted at OU 7-13/14 project sites.

2.2 Environmental Restoration Management Responsibilities

An overview of the direct managerial positions and lines of responsibility and communication for overseeing the OU 7-13/14 project are outlined in this section. The names of key management individuals for emergency contact purposes are listed in Table 11-4 of this HASP.

2.2.1 Environmental Restoration Director

The INEEL ER Director has the ultimate responsibility for the technical quality of all projects, maintaining a safe environment, and the safety and health of all personnel during field activities performed by or for the Environmental Restoration Program (ERP). The ER Director provides technical coordination and interfaces with the DOE-ID Environmental Support Office. The ER Director ensures that:

- Project/program activities are conducted according to all applicable federal, state, local, and company requirements and agreements
- Program budgets and schedules are approved and monitored to be within budgetary guidelines
- Personnel, equipment, subcontractors, and services are available, as required
- Direction is provided to develop tasks, evaluate findings, develop conclusions and recommendations, and produce reports.

2.2.2 Environmental Restoration Safety, Health, and Quality Assurance Manager

The ER SH&QA manager is responsible to manage resources to ensure that SH&QA programs, policies, standards, procedures, and mandatory requirements are planned, scheduled, implemented, and executed in the day-to-day operations for the ERP operations conducted at the INEEL. The manager directs the SH&QA compliance accomplishment of all activities by providing technical and

administrative direction to subordinate staff and through coordination with related functional entities. The ER SH&QA manager reports to the ER Director. Under the direction of the ER Director, the ER SH&QA manager represents the ER Directorate in all SH&QA matters. This includes responsibility for ERP SH&QA compliance and oversight for all ER CERCLA and decontamination and dismantlement operations planned and conducted at the RWMC (WAG 7) and for ERP INEEL-wide environmental monitoring activities.

The ER SH&QA manager is responsible to manage the following technical disciplines and implement the programs related to these disciplines:

- Radiological control personnel (matrixed)
- Industrial safety personnel
- Fire protection personnel
- Quality assurance personnel
- Industrial hygiene personnel (matrixed)
- Emergency preparedness personnel (matrixed).

2.2.3 Waste Area Group 7 Manager

The ER WAG 7 manager shall ensure that all WAG 7 activities conducted comply with INEEL MCPs and PRDs; all applicable OSHA, EPA, DOE, Department of Transportation, and state of Idaho requirements; and that tasks comply with INEEL PLN 125, the “Quality Assurance Project Plan for Waste Area Groups 1, 2, 3, 4, 5, 6, 7, 10, and Inactive Sites (Draft),” (QAPjP) (DOE-ID 2000b), this HASP, and the *Field Sampling Plan for Monitoring of Type-B Probes in Support of the Integrated Probing Project Operable Unit 7-13/14*, (FSP). The ER WAG 7 manager is responsible for the overall work scope, schedule, and budget for all WAG 7 projects.

2.2.4 Waste Area Group 7 Project Engineer

The WAG 7 project engineer (PE) is responsible for the overall technical quality of the WAG 7 ER projects. The responsibilities of this PE include the following:

- Ensure technical content and quality of project deliverables
- Provide technical oversight, direction, and acceptance of environmental products developed by project teams and project sub-contractors
- Provide project-specific point of contact services for the recruitment and de-staffing of projects for scientific, technical, and engineering staff
- Be cognizant of, and stay ahead of technical project issues, focusing on planning, design, and execution of tasks to ensure compliance with environmental regulations, permits, INEEL policies and DOE orders
- Maintain close coordination with other key project points of contact to maintain project schedules, milestones, and to develop action plans, as required, that meet project goals

- Coordinate and schedule formal and informal reviews of all project-produced documentation to assure scientific, technical, and engineering excellence in the delivered product
- Coordinate and plan appropriate mitigation strategies to minimize long-term impacts of tasks conducted
- Identify scientific, technical, and engineering issues that affect the cost effectiveness, constructability, and operation or maintenance of systems developed for deployment.

2.2.5 Operable Unit 7-13/14 Integrated Probing Project Manager

The INEEL OU 7-13/14 integrated probing PM is responsible for the scope, schedule, and budget for these activities. Also, the PM is responsible to interface with and support the INEEL WAG 7 manager for tracking purposes. The OU 7-13/14 integrated probing PM shall ensure that all activities conducted during the project comply with the project procedures, applicable INEEL MCPs and PRDs, and all applicable OSHA, EPA, DOE, Department of Transportation, and state of Idaho requirements. The PM shall ensure that tasks comply with INEEL PLN-125, the QAPjP, this HASP, and the project FSP. The OU 7-13/14 integrated probing PM coordinates all document preparation, field, laboratory, and modeling activities.

The OU 7-13/14 integrated probing PM interfaces with RWMC management to implement the project requirements and ensure work is performed as planned for the OU 7-13/14 integrated probing project. This PM is responsible to (a) develop resource-loaded, time-phased control account plans based on the RWMC Remediation Project technical requirements, budgets, and schedules; and (b) assign OU 7-13/14 integrated probing project tasks.

2.2.6 Radioactive Waste Management Complex Facility Interface

The person assigned as the RWMC interface is responsible to implement the OU 7-13/14 project-RWMC interface agreement (IAG-13) and work with the OU 7-13/14 integrated probing PM to ensure all required RWMC resources are in place to meet the project requirements. The RWMC facility interface person may be assigned additional tasks by the OU 7-13/14 integrated probing PM and may attend RWMC POD meetings as a project representative.

3. RECORD-KEEPING REQUIREMENTS

3.1 Industrial Hygiene and Radiological Monitoring Records

The IH (or IH technician) will record airborne monitoring and/or sampling data (both area and personal) on the INEEL Hazards Assessment and Sampling System (HASS). All monitoring and sampling equipment shall be maintained and calibrated per INEEL procedures and the manufacturer's specifications. Industrial hygiene airborne monitoring and sampling data is treated as limited access information and maintained by the IH procedures, per *INEEL Safety and Health Manual*, Manual 14B.

The RCT maintains records of all radiological monitoring, daily task-site operational activities, air samples, surveys, and instrument calibrations. Radiological monitoring records are maintained according to the Manual 15A, *Radiation Protection-INEEL Radiological Control Manual* procedures.

Industrial hygienist and RCT monitoring and sampling (both area and personal) data will be made available to task-site personnel or their representative upon request.

3.2 Field Team Leader Logbook

The FTL will keep a record of daily task-site events in the FTL logbook. The FTL logbook must be obtained from ER Administrative Record and Document Control (ARDC). Completed logbooks are submitted to ARDC along with other documents at the project's completion. Logbooks will be maintained in accordance with MCP-231, "Logbooks."

3.3 Site Attendance Record

This site attendance record will be used to keep a record of all personnel (workers and nonworkers) who are onsite each day and be used to assist the area warden to conduct personnel accountability should an evacuation take place (see Section 11 of this HASP for emergency evacuation conditions). Personnel will only be required to sign in and out of the attendance record once each day. The FTL is responsible to maintain the site attendance record and ensure all personnel on the project site sign in.

3.4 Administrative Record and Document Control Office

The ARDC shall organize and maintain data and reports generated by ER program field activities. The ARDC maintains a supply of all controlled documents and provides a documented system for the control and release of controlled documents, reports, and records. Copies of the management plans for the ER program, this HASP, the *Quality Program Plan for the Environmental Restoration Program*, PLN-125, the QAPJP, and other documents pertaining to this work are maintained in the project file by the ARDC. All project records and logbooks, except IH and RCT records, must be forwarded to ARDC within **30** days after completion of field activities.

4. PERSONNEL TRAINING

All OU 7-13/14 integrated probing project site personnel shall receive training as specified in OSHA 29 CFR 1910.120/1926.65, the INEEL safety and health manuals, *INEEL Training Requirements Matrix Manual*, the *INEEL Training and Qualifications Manual*, Manual-12, and MCP-1764, “RWMC Operating Requirements.” Radiation workers shall be trained according to MCP-126, “Training.” Table 4-1 summarizes the project-specific training requirements for task-site personnel based on position and required access into the specific areas at the task site. Specific training requirements for each worker may vary depending on the hazards associated with their individual job assignment and required access into radiologically controlled areas. Changes to the training requirements listed on Table 4-1 (adding or eliminating) may be necessary based on changing field conditions or work scope. Any changes to those listed on Table 4-1 must be approved by the HSO with concurrence from the FTL, PM and RadCon (as applicable).

4.1 General Training

All project personnel are responsible to meet required OU 7-13/14 training (including applicable refresher training) and evidence of training will be maintained at the OU 7-13/14 project site or electronically (e.g., Training Records and Information Network [TRAIN]) at the OU 7-13/14 administrative trailer. Nonfield team personnel and visitors must be able to provide evidence of meeting required training for the area they wish to access prior to being allowed into controlled project areas. Examples of acceptable written training documents include the following:

- 40 hour OSHA HAZWOPER Card
- Respirator Authorization Card
- DOE Certificate of Core Radiological Training II Card
- Medic/First Aid Training Card
- A copy of an individual or department’s (INEEL only) TRAIN system printout, demonstrating completion of training.

Upon validation, a copy of the training certificate issued by an approved, non-INEEL training vendor or institution is also acceptable proof of training. The DOE radiological worker training must be documented on an official authorized card and have the designated INEEL site-specific training stamped or written on the card.

4.2 Project-Specific Training

Before beginning work at the OU 7-13/14 project sites, project-specific HASP training will be conducted by the HSO or designee. This training will consist of a complete review of a controlled copy of the project HASP and attachments, applicable job safety analyses (JSA), SWPs (if required), TPRs and other applicable work control/authorization documents with time for discussion and questions. Project-specific training can be conducted in conjunction with, or separately from the required, formal, pre-job briefing, per MCP-3003.

At the time of project-specific HASP training, personnel training records will be checked and verified to be current and complete for all required training shown in Table 4-1. Once the HSO or designee has completed site-specific training, personnel will sign a Form 361.25, “Group Read and Sign

Training Roster,” or equivalent, indicating that they have received this training, understand the project tasks and associated hazards/mitigation, and agree to follow all HASP and all other applicable work control and safety requirements.

Note: Form 361.47, “Group Read and Sign Training Roster,” or equivalent training forms, are available on the INEEL Intranet under “Forms”.

A trained HAZWOPER 8-hour supervisor (FTL or other HAZWOPER supervisor trained person) will monitor each newly 24-hour or 40-hour trained worker’s performance to meet the one day or three days of supervised field experience, respectively, in accordance with 29 CFR 1926.65(e). Following the supervised field experience period, the supervisor will complete a Form 361.47, “HAZWOPER Supervised Field Experience Verification” or equivalent, to document the supervised field experience.

Note 1: Supervised field experience is only required if personnel have not previously completed this training at another CERCLA site (documented) or they are upgrading from 24-hour to 40-hour HAZWOPER training. A copy must be kept at the project site as evidence of training or be available electronically.

Note 2: Completed training project forms (Form 361.47 or equivalent) must be submitted to the ER training coordinator for inclusion in the TRAIN system within five working days of completion.

4.3 Daily Plan of the Day and Lessons Learned Meeting

The FTL, or designee, will conduct a daily POD meeting with other field team members contributing (HSO and RCT, as applicable). During this meeting, daily tasks are to be outlined, hazards identified, hazard controls/mitigation and work zones reviewed, PPE requirements discussed, and employees’ questions answered. At the completion of this meeting, any new work control documents will be read and signed (e.g., SWPs, RWPs, JSAs). Particular emphasis will be placed on lessons learned from the previous day’s activities and how tasks can be completed in the safest, most efficient manner. All personnel will be asked to contribute ideas to enhance worker safety and mitigate potential exposures at the project sites. This POD will be conducted as an informal meeting and the only required record will be to document the completion of the POD in the FTL logbook.

Table 4-1. Required training for operable unit 7-13/14 integrated probing project site personnel.

Training	Field Team Leader	Radiological Control Technicians, Industrial Hygienist Samplers	Driller Helpers	Health and Safety Officer, Safety Professional, Radiological Engineer	Drill Operator, Logging Team	Access Beyond the Safety Zone	Access to Safety Zone Only (Inside the Subsurface Disposal Area)
40-hr HAZWOPER ^{a,b}	Yes	Yes	Yes	Yes	Yes	---	---
24-hr HAZWOPER ^c	---	---	---	---	---	Yes	Yes
8-hr HAZWOPER Refresher ^d	Yes	Yes	Yes	Yes	Yes	---	Yes
HAZWOPER supervisor	Yes	---	---	HSO	---	---	---
Project-specific HASP training ^e	Yes	Yes	Yes	Yes	Yes	---	Yes
RW I (INEEL site-specific) ^f	---	---	---	---	---	---	Yes ^c
RW II (INEEL site-specific)	Yes	Yes	Yes	HSO/SP	Yes	Yes ^f	---
Fire watch ^g	Yes	---	Yes	HSO	---	---	---
CPR/medic first aid ^g	Yes	---	Yes	HSO	---	---	---
Respirator training (full-face) ^h	Yes	Yes	Yes	HSO	---	---	---
HAZMAT employee general awareness	---	Samplers	---	---	---	---	---
Glove bag installation/removal	Yes	Samplers	---	---	---	---	---
RWMC area warden training	Yes	---	---	HSO	---	---	---
RWMC access training	Yes	Yes	Yes	Yes	Yes	Yes ^c	Yes ^c

a. 40-hr HAZWOPER required training will also include an additional 24 hours of HAZWOPER supervised field experience as required by 29 CFR 1910.120(e). This field experience for this project will be documented on Form 361.47, "HAZWOPER Supervised Field Experience Verification" (or equivalent form).

b. Minimum requirements for unescorted EZ access (HSO approval also required).

c. Minimum requirement for unescorted RWMC SDA access or must be escorted by fully trained individual.

d. As required, based on initial HAWOPER training date. Must be completed or scheduled by HAZWOPER training anniversary date.

e. Includes project-specific HAZCOM, site-access/security, decontamination and emergency response actions, as required by 29 CFR 1910.120(e).

f. RW II required for all field team members and samplers. Others may be escorted as deemed appropriate by RWMC RadCon.

g. At least one trained person on site when field team is working.

h. Full-face protection if entering area requiring respiratory protection.

CP = command post CPR = cardiopulmonary resuscitation EZ = exclusion zone HASP = health and safety plan HAZCOM = hazard communications HAZMAT = hazardous materials
HAZWOPER = hazardous waste operations HSO = health and safety officer RW = radiological worker RWMC = Radioactive Waste Management Complex SDA = Subsurface Disposal Area
SP = safety professional SZ = support zone

5. OCCUPATIONAL MEDICAL SURVEILLANCE PROGRAM

The INEEL task-site personnel shall participate in the INEEL OMP, as required by DOE Order 5480.8a, "Contractor Occupational Medical Program," and OSHA 29 CFR 1910.120/1926.65. Medical surveillance examinations will be provided before assignment, annually, and after termination of hazardous waste site duties or employment. This includes personnel who are or may be exposed to hazardous substances at or above the OSHA-permissible exposure limit (PEL) or published exposure limits, without regard to respirator use, for 30 or more days per year. Personnel who wear a respirator in performance of their job, or who are required to take respirator training to perform their duties under this plan, must participate in the medical evaluation program for respirator use at least annually as required by 29 CFR 1910.134.

A single copy of the project HASP, job hazard analysis, required PPE, confined space entry (as applicable), and other exposure-related information shall be made available by the PM to an OMP physician (and subcontractor physicians) conducting medical surveillance for employees participating in this project upon request. Exposure monitoring results and hazard information furnished to the OMP physician must be supplemented or updated annually as long as the employee is required to maintain a hazardous waste/ material employee medical clearance.

The OMP physician shall evaluate the physical ability of an employee to perform the work assigned, as identified in the OU 7-13/14 integrated probing project HASP, or other job-related documentation. A documented medical clearance (physician's written opinion) will be provided to the employee and line management stating whether the employee has any detected medical condition that would place him/her at increased risk of material impairment of his/her health from work in hazardous waste operations, emergency response, respirator use, and confined space entry (as applicable). The physician may impose restrictions on the employee by limiting the amount and/or type of work performed. Occupational Medical Program responsibilities, with regard to personnel assigned to hazardous waste site activities, include, but are not limited to the following:

- Provide current comprehensive medical examinations (as determined by the examining physician) at an INEEL medical facility for full-time personnel
- Obtain records/reports from employee's private physicians, as required by the OMP director
- Perform a medical evaluation on return-to-work cases following an absence in excess of one work week (40 consecutive work hours) resulting from illness or injury
- Conduct a medical evaluation in the event that management questions the ability of an employee to work or if an employee questions his/her own ability to work.

Note 1: Project management shall ensure that a Form 3402.02, "Employee Job Function Evaluation," is validated by the project IH and then submitted to the OMP for review before any employee can begin work on the project.

Note 2: Employees shall not be permitted to work on the project until the OMP has sent a medical clearance to management or the IH has validated that no potential exists for exposure above the established action levels (AL) and that no additional substance-specific medical evaluations are required.

The attending physician will evaluate all information provided, including medical questionnaires; physical examination findings; blood chemistry and urinalysis results; preexisting medical conditions; nature of work to be performed; actual and potential hazards and exposures; and other factors deemed appropriate by the physician to determine the following for each employee:

- Ability to perform relevant occupational tasks
- Ability to use respiratory protection
- Ability to work in other PPE and heat or cold-stress environments
- Requirement for entry into substance-specific medical surveillance programs.

If the OMP does not have sufficient information to complete a medical evaluation before respirator training, the employee's supervisor will be notified. The employee will not be permitted to fit test until the needed information is provided and any additional examination or testing is completed.

5.1 Subcontractor Workers

Subcontractor task-site personnel shall participate in a subcontractor medical surveillance program that satisfies the requirements of OSHA 29 CFR 1910.120/1926.65. This program must make medical examinations available before assignment, annually, and after termination of hazardous waste duties. The physician's written opinion will serve as documentation that subcontractor personnel are fit for duty.

Medical data from the subcontractor employee's private physician, collected pursuant to hazardous material worker qualification, shall be made available to the INEEL OMP physicians upon request. Also, subcontractor employee past radiation exposure histories must be submitted to the INEEL radiation dosimetry and records section, in accordance with MCP-188, "Issuance of Thermoluminescent Dosimeters (TLDs) and Obtaining Personnel Dose History," and MCP-2381, "Personnel Exposure Questionnaire."

5.2 Injuries on the Task Site

It is INEEL policy that an INEEL OMP physician examine all injured personnel. Injured personnel include employees injured on the job, employees experiencing signs and symptoms consistent with exposure to a hazardous material, or those that have been exposed to toxic substances or physical or radiological agents in excess of allowable limits.

Note: Subcontractor employees will be taken to the closest INEEL medical facility to have an injury stabilized or occupational exposure evaluated before transport to the subcontractor's treating physician or medical facility.

In the event of a known or suspected injury or illness resulting from exposure to a hazardous substance or physical or radiological agent, the employee shall be transported to the nearest INEEL medical facility for evaluation and treatment, as necessary. The FTL or HSO is responsible to obtain as much of the following information as is available to accompany the individual to the medical facility:

- Name, job title, work (site) location, and supervisor's name and phone number

- Substance(s), physical or radiological agent(s) exposed to (known or suspected); material safety data sheet (MSDS), if available
- Nature of the incident, injury, or exposure, and related signs or symptoms of exposure
- First-aid or other measures taken
- Locations, dates, and results of any airborne exposure monitoring and/or sampling
- Personal protective equipment in use during this work (i.e., type of respirator and cartridge used).

Further medical evaluation will be determined by the examining and treating physician, according to the signs and symptoms observed, hazard involved, exposure level, and specific medical surveillance requirements established by the OMP director in compliance with 29 CFR 1910.120/1926.65.

The RWMC shift supervisor will be contacted if any injury or illness occurs at any OU 7-13/14 project site. As soon as possible after an injured employee has been transported to the INEEL medical facility, the FTL or designee will make notifications as indicated in Section 11.4.5 of this HASP.

Radiological control personnel will evaluate all actual and/or suspected abnormal radiological exposures in excess of allowable limits and will establish the follow-up actions. For internal uptakes (as calculated committed effective dose equivalent values), EDF-INEL003, “Established Levels of Radionuclide Intake for Consideration of Medical Intervention” will be used as the basis for this evaluation and follow-up actions. An OMP physician will examine all wounds to determine the nature and extent of the injury. The RadCon supervisor will determine if the wound can be bandaged adequately for entry into a radiological contamination area, in accordance with Article 542 of the Manual 15A, *Radiation Protection-INEEL Radiological Control Manual*.

Selected project personnel will submit baseline and project termination bioassay samples (as determined by RadCon) because of plutonium isotopes being present in SDA pits. If any uptake event is suspected, an additional sample will be submitted for analysis in accordance with MCP-191, “Radiological Internal Dosimetry.”

5.3 Substance-Specific Medical Surveillance

The only contaminants of concern at OU 7-13/14 integrated probing project pits in the SDA that would potentially require additional substance-specific regulatory medical surveillance are asbestos, cadmium, lead, and beryllium. The release potential from these contaminants is considered very low, based on (1) the nature of the probe installation (sonic, with no return material back to the surface), (2) dust-control airhood used during installation, and pore size of the stainless steel porous portion of select Type-B probes. No occupational exposures approaching the regulatory substance-specific action limits are anticipated. This is based on (1) factors listed above, (2) the quantity of material present (Table 8-3), (3) distribution and mixing of these contaminants from flooding and subsidence events, (4) waste seam location under a clean overburden layer, (5) sampling confinement and barriers, (6) administrative controls, and (7) worker training. Section 8 of this HASP details specific contaminants, and Table 8-4 evaluates the potential exposure for each.

